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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,

Case:2:22-cr-20617  
Judge: Goldsmith, Mark A.  
MJ: Patti, Anthony P.  
Filed: 11-16-2022 At 04:39 PM  
INDI USA V. MORGAN (NA)

v.

Violations: 18 U.S.C. § 922(g)(1)  
21 U.S.C. § 841(a)(1)  
18 U.S.C. § 924(c)(1)(A)

CLYDE MORGAN,

Defendant.

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**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**  
18 U.S.C. § 922(g)(1)  
*Felon in Possession of a Firearm*

On or about June 30, 2022, in the Eastern District of Michigan, the defendant, CLYDE MORGAN, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in or affecting interstate or foreign commerce, a firearm, namely two American Tactical .22 caliber rifles, one Glock 27 .40 caliber pistol, and one Glock 43 9mm caliber pistol, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO**

21 U.S.C. § 841(a)(1)

*Possession with Intent to Distribute a Controlled Substance*

On or about June 30, 2022, in the Eastern District of Michigan, the defendant, CLYDE MORGAN, knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine; in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**

21 U.S.C. § 841(a)(1)

*Possession with Intent to Distribute a Controlled Substance*

On or about June 30, 2022, in the Eastern District of Michigan, the defendant, CLYDE MORGAN, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine; in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT FOUR**

18 U.S.C. § 924(c)(1)(A)

*Possession of a Firearm in Furtherance of a Drug Trafficking Crime*

On or about June 30, 2022, in the Eastern District of Michigan, the defendant, CLYDE MORGAN, knowingly possessed a firearm, namely one American Tactical .22 caliber rifle and one Glock 27 .40 caliber handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, specifically, possession with intent to distribute a controlled

substance as alleged in Count Two and Three of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

**FORFEITURE ALLEGATIONS**

21 U.S.C. § 853, 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c)  
*Criminal Forfeiture*

The allegations contained in Count One and Four of this Indictment are incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c). The allegations contained in Count Two and Three of this Indictment are incorporated by reference for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853.

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction of the offenses set forth in Count One and/or Four of this Indictment, the defendant shall forfeit to the United States any firearms and ammunition involved in or used in the knowing commission of the offense(s), including but not limited to:

- a. Two American Tactical .22 caliber rifles;
- b. One Glock 27 .40 caliber pistol;
- c. One Glock 43 9mm caliber pistol; and
- d. Assorted rounds of ammunition.

Pursuant to 21 U.S.C. § 853(a), upon conviction of the offenses in violation of 21 U.S.C. § 841 set forth in Count Two and Three of this Indictment, the defendant shall forfeit to the United States: (a) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a

result of such violation(s); and (b) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation(s).

**Money Judgment:** Such property includes, but is not limited to, a money judgment in an amount to be determined, representing the total value of all property subject to forfeiture as described herein.

**Substitute Assets:** If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek to forfeit any other property of defendant up to the value of the forfeitable property described above.

**Money Judgment:** Upon conviction of violating Title 21, United States Code, Section 841, defendant shall be ordered to pay the United States a sum of money equal to the total amount of proceeds defendant obtained as a result of such violation(s).

THIS IS A TRUE BILL

*s/ Grand Jury Foreperson*

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GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

*s/ Brandy R. McMillion*

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BRANDY R. McMILLION  
Chief, General Crimes Unit

*s/ Erin L. Ramamurthy*

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ERIN L. RAMAMURTHY  
Assistant United States Attorney

Dated: November 16, 2022

Case:2:22-cr-20617  
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**Criminal Case Cover**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: <b>ELR</b>

**Case Title:** USA v. Clyde Morgan

**County where offense occurred :** Wayne

**Check One:**     **Felony**                     **Misdemeanor**                     **Petty**

Indictment/\_\_\_\_ Information --- no prior complaint.  
 Indictment/\_\_\_\_ Information --- based upon prior complaint [Case number: \_\_\_\_]  
 Indictment/\_\_\_\_ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

Corrects errors; no additional charges or defendants.  
 Involves, for plea purposes, different charges or adds counts.  
 Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 16, 2022  
 Date

Erin L. Ramamurthy

Erin L. Ramamurthy  
 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.